

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,
Plaintiff,

vs.

WORLD VISION, INC.
Defendant.

CASE NO. 2:21-CV-00920-JLR

SECOND DECLARATION OF
SCOTT J. WARD

Scott J. Ward declares:

1. I have personal knowledge of the facts stated in this declaration and am competent to testify to those facts.

2. I am an attorney of record for Defendant World Vision, Inc ("**World Vision**" or "**WV**") in this case.

3. I reside in Virginia, am licensed to practice law in Virginia and California, and have been admitted by the Court *pro hac vice* in this case.

4. This Second Declaration of Scott Ward is denoted “**SW2**” herein, and in the accompanying Defendant World Vision’s Reply Brief in Support of Its Motion for Summary Judgment, and the exhibit to this Declaration is denoted **SW2-01**. This is the same numbering system used for all Declarations in the Motion for Summary Judgment.

5. All documents or other items referenced herein, or in the exhibit hereto, that contain Bates numbers are from the document production exchanged by the parties during discovery in this case. (The total discovery record ranges from WV0001 to WV6197 for Defendant World Vision and from P0001 to P0137 for the Plaintiff, and includes photographs, other physical exhibits, and digital audio and visual files.

6. Attached as Exhibit **SW2-01** hereto is a true and correct copy of a World Vision document titled *Giving Word to Our Faith* (“GWF”) that was produced by World Vision in discovery bearing Bates numbers WV-6158 to WV-6169. Exhibit **SW2-01** is the complete GWF document. Plaintiff included as Exhibit 7 to the Declaration of Casimir Wolnowski, Dkt. 25-7, a single page (WV-6164) from this GWF document.

I am over the age of eighteen and am competent to give this Declaration. I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

SIGNED this 5th day of May, 2023, at Vienna, Virginia.

/s/ Scott J. Ward
SCOTT J. WARD